DISASTER ALERT



FLOOD 1998

JOB TRAINING PARTNERSHIP ACT

Employment Development Department

Number: FA98-2

Date: February 18, 1998

69-1:39:das

TO: SERVICE DELIVERY AREA ADMINISTRATORS

CALIFORNIA CONSERVATION CORPS

LA COOPERATIVA CAMPESINA DE CALIFORNIA

NORTHERN CALIFORNIA INDIAN DEVELOPMENT COUNCIL

SUBJECT: INITIAL FUNDING AND PLANNING UPDATE

	FOR YOUR INFORMATION	X	FACSIMILE COPY TRANSMITTED	X	DISTRIBUTED VIA INTERNET
X	IMMEDIATE ACTION	X	HARD COPY MAILED		OVERNIGHT CARRIER DISTRIBUTION

The U.S. Department of Labor (DOL) has issued a press release announcing an award of up to \$25 million for an emergency project to create approximately 2,000 temporary jobs to assist in the clean-up and repair efforts in the aftermath of flooding. An initial amount of \$8 million will be awarded for immediate use. The balance of the funding will be made available upon submittal of fully documented project plan.

As you were notified in Flood Alert 1998 #FA98-1, a planning meeting was held in Sacramento on February 11, 1998. Attached are the following materials that were distributed at the meeting for your information for those unable to attend:

- 1. Meeting Minutes Flood 1998
- 2. Fact Sheet
- 3. Estimate of Need Form
- 4. Project Plan Forms
- 5. Meeting Minutes Flood 1997

Please note the initial Estimate of Need form is to be completed and returned by February 23, 1998.

These alerts will continue to be mailed to all SDAs, thorough April 30, 1998, for informational purposes. Beginning May 1, 1998, mailing will be limited to participating disaster declared project operators. However, alerts will continue to be made available on the Internet for all interested parties. Please refer any questions regarding this matter as follows:

<u>Contact</u>	<u>Telephone</u>	<u>Fax</u>	<u>Email</u>
Luis Hermosillo	(916) 654-5416	(916) 657-0055	lhermosi@edd.ca.gov
Laine Hendra-Aldrich	(916) 654-5595	(916) 657-0055	lhendra@edd.ca.gov

/S/ JIM CURTIS, Manager Program Management Section

Attachments

FLOOD ASSISTANCE 1998 MEETING MINUTES

Employment Development Department Job Training Partnership Division 750 N Street, Conference Room A Sacramento, CA 95814 Wednesday, February 11, 1998 10:00 a.m. through 2:00 p.m.

A. INFORMATION DISCUSSION

1. CURRENT STATUS

- Twenty-seven counties, (has increased to thirty-one as of February 14, 1998)
 encompassing twenty-five Service Delivery Areas (SDA), have been declared disaster areas by the President, eligible for federal assistance.
- The Governor will request an initial allocation of \$25 million dollars from the Title III
 National Reserve Account for Disaster Assistance; more may be requested later based on
 needs assessment, subsequent storms and the possible declaration of additional counties
 as disaster areas.
- California anticipates a quick response to the request, and therefore SDAs need to act quickly and be ready to start work as soon as the funds are received.
- In addition to the SDAs and Employment Development Department (EDD) field offices, three other organizations will be participating in this project: La Cooperativa, the California Conservation Corps (CCC), and the Northern California Indian Development Council (NCIDC).

2. PROJECT COMMUNICATION

 Laine Hendra-Aldrich and Luis Hermosillo are the Job Training Partnership Division (JTPD) staff responsible for the development and implementation of the 1998 Flood Project. They will be the principle contacts for questions and technical assistance, and may be reached at the following numbers:

<u>Contact</u>	<u>l elephone</u>	<u>Fax</u>	<u>Email</u>
Luis Hermosillo	(916) 654-5416	(916) 657-0055	lhermosi@edd.ca.gov
Laine Hendra-Aldrich	(916) 654-5595	(916) 657-0055	lhendra@edd.ca.gov

If you cannot reach Laine or Luis, please contact Don Migge, JTPD Projects Unit Manager, or Jim Curtis, JTPD Program Management Section Manager, at (916) 654-7799.

- Once the project has been implemented, the assigned SDA Program Managers will be the principle contacts for information and assistance.
- JTPD will use "Disaster Alert Flood 1998" notices, rather than directives and information bulletins, to send written communications regarding the 1998 project to the SDAs and other project operators. The first alert, FA98-1 announcing this meeting, was dated February 9, 1998.

3. PROJECT PLANNING AND IMPLEMENTATION

- Once the JTPD receives approval of funding from the Department of Labor (DOL), we will calculate a reasonable distribution based on the SDAs' preliminary assessment of need (NOTE: due back to JTPD by the close of business, February 23, 1998, sooner if possible). A minimum threshold of \$85,000 per SDA has been established.
- After DOL approval, the JTPD can provide letters of intent to SDAs in order to expedite the implementation process.
- SDAs and other project operators need to establish communications with various agencies within their counties to begin as soon as possible the development of worksites.
- To be considered appropriate, the work must be for the repair of damage to public or private non-profit property or for work which mitigates the increased workloads of such entities generated by the flood disaster (e.g., increased clerical needs, preparation and dissemination of disaster information, disaster surveys, etc.).
- Work may be done on private property only if there is a danger to public health and safety; in such cases, the SDA/project operator must have a written declaration from an appropriate governmental authority (e.g., Board of Supervisors, health department, fire district, reclamation district, etc.).
- In all cases, SDAs and project operators must ensure that there are no "maintenance of effort" violations, including: displacement of regular employees or filling available slots already budgeted for regular hires; impairment of existing contracts for services or existing collective bargaining agreements; or job creation in promotional lines that infringe on promotional opportunities of existing employees.

4. TEMPORARY JOB CREATION (TJC) - RULES AND LIMITATIONS

- To be eligible, an individual must be a dislocated worker eligible under Section 301(a) of the Job Training Partnership Act, with the following order of priority: workers dislocated by the flood disaster, those who are "long-term unemployed" (for the flood project, this is defined as unemployed at application, has not worked for at least 15 of the prior 26 weeks, and is unlikely to return/has limited opportunities for return to the prior job within the 14 days immediately following application), and other Title III eligibles. NOTE: Although this is a priority order, SDAs and project operators should not delay project implementation, and may enroll those eligible in any category.
- The jobs created must be in public or private non-profit agencies.
- The payment of Unemployment Insurance (UI) is not mandatory; it is a local choice; if UI is paid, the participant must have additional quarters of non-TJC wages in order to receive UI benefits.
- The employment of any individual must not exceed six months duration or 1,040 hours if the participant works fewer than 40 hours per week.
- The maximum wages allowed per individual (excluding benefits) is \$12,000.
- Wages and benefits shall be charged to Retraining.
- Basic Readjustment costs should be kept to a minimum.
- Administration costs should be kept to a minimum, and will be negotiated with each participating SDA and project operator.

5. MONITORING AND REPORTING

- JTPD staff will closely monitor the implementation of the projects to ensure expeditious start-up.
- The official compliance monitoring of the projects will be conducted by the EDD Compliance Review Division.
- Twice-per-month Monthly Supplemental Estimate Reports (MSER) and quarterly reports will be required; reporting instructions will be disseminated later via a Disaster Alert.

6. PROJECT PLAN

- A project plan application was distributed at the meeting; another copy will be sent via a Disaster Alert.
- Address any questions regarding the plan application to Laine or Luis.

B. QUESTIONS AND ANSWERS

- Q. When will JTPD receive funding approval from DOL?
 - A. We are hoping to get it as early as Friday, February 13; we will get funding to the SDAs and other project operators as quickly as possible, based on the preliminary needs assessments due by February 23, and the total amount received from DOL. (NOTE: if the needs assessments are returned prior to February 23, we may be able to get the funds out prior to that date).
- 2. Q. Should the preliminary needs assessments be based only on immediate needs, or may we base it on projected subsequent needs? For example, the snow runoff later in the Spring may cause significant damage. Also, impending storms may cause further damage and more counties declared disaster areas.
 - A. The preliminary assessments should be based only on immediate needs. If further damage occurs, we will ask for further needs assessments and more funding from DOL.
- 3. Q. Should the needs assessment and funding requests be based only on those counties (currently 27) that have been officially declared disaster areas by the federal government?
 - A. Yes.
- 4. Q. If an individual participated in the 1997 Flood Project, may they be enrolled in the 1998 project?
 - A. Yes. They may be enrolled without regard to the long-term unemployed definition of 15 of the prior 26 weeks, since the flood projects are not considered "employment" for Title III eligibility determination purposes. They may be enrolled for a (new) maximum duration of six months or \$12,000 in wages.

- 5. Q. If the participant is currently working on the 1997 project, may they be transferred to the 1998 project, or must the individual be terminated and re-enrolled in the 1998 project?
 - A. The person must be terminated and re-enrolled, since these are separate and distinct projects and must be tracked and reported separately. However, as noted in the previous question, 1997 project participation does not affect their eligibility for the 1998 project.
- 6. Q. If a 1997 project participant has terminated, and is now receiving transitional assistance under other JTPA funding, may that individual be counted as a job placement if they are enrolled in the 1998 Flood Project?
 - A. No. This would not be considered a placement into unsubsidized employment.
- 7. Q. May a participant in other JTPA funding be co-enrolled in the 1998 flood project?
 - A. Yes, however the transitional services should either be put on hold or offered in such a way as not to inhibit work in the flood project, since the primary focus of the flood project is repairing the disaster damage. NOTE: The Code of Federal Regulations (CFR), Title 20, Section 631.5, states that individuals who are participants in other Title III programs may participate in a disaster project <u>unless</u> the individual is actively engaged in a training program. We will seek clarification to determine if this prohibition is absolute, or if there may be flexibility for example, putting the current training on hold, and continuing it after the TJC participation. Further information will be forthcoming.
- 8. Q. Some SDAs have experienced problems with eligibility determinations performed by local EDD offices for the non-SDA project operators, regarding those individuals later referred to the SDAs for transitional services. Shouldn't SDAs be given the funds to do these eligibility determinations, since they have more expertise in this area?
 - A. EDD management has indicated that the local field offices will receive funding to perform this function. The JTPD in conjunction with the Job Service will provide all necessary technical assistance to the local offices to help them fulfill this function. Voice any concerns you may have to appropriate staff or management in the Program Management Section of the JTPD.
- 9. Q. Can the preliminary assessments and funding requests include prevention needs or can it be for damage repair and recovery only?
 - A. The State has asked for approximately \$11 million for disaster prevention and preparedness. To date we have not received a formal answer from DOL. It appears that the DOL stance is that the Secretary of Labor has no authority to authorize disaster relief funding for disaster prevention. Therefore, all assessments and projects must be for disaster repair and recovery, unless we hear otherwise from DOL.

- 10. Q. Workers Compensation claims from prior disaster projects have had negative effects on premium rates, which may be raised significantly and permanently. Can EDD provide supplementary funding to mitigate this?
 - A. No. However, we suggest that you investigate setting up a separate policy for the flood project.
- 11. Q. Previous disaster projects operated by the non-SDA project operators have been monitored by EDD using guides designed for monitoring the SDAs. Some of the areas monitored are inappropriate regarding the non-SDAs. Can the monitoring guides be modified appropriately regarding the non-SDAs?
 - A. JTPD will work with the EDD Compliance Review Division to ensure that the monitoring guides for non-SDAs are appropriate.

Flood Assistance 1998 Temporary Jobs Creation (TJC) Fact Sheet

The California Employment Development Department (EDD) has requested a \$25. million grant from the U.S. Department of Labor to administer a disaster recovery project, which features a temporary jobs creation (TJC) component. The term of the of the project through February 28, 1999. The grant funds are to be used by public or private non-profit agencies for activities relating to the 1998 floods. The TJC component is only to be used to employ workers who are:

- Unemployed as a result of the floods;
- Those considered long-term unemployed (those who are unemployed 15 weeks out of the last 26 weeks);
- Eligible for JTPA Title III services.

The wages of TJC employees will be paid through funds provided by this grant.

The areas targeted for the temporary jobs creation program are the 27 counties that were declared disaster areas by the president.

Flood related TJC activities to be conducted with the funds provided by the grant may include, but are not limited to:

- Assisting in clean-up, repair and reconstruction of public and private non-profit property.
- Prevention, education, and public safety awareness efforts.
- Supplement existing staff whose workloads and caseloads have increased as a result of the disaster.

TJC participants may include clerical support, construction workers, case workers, and highly skilled professionals. The criteria for participation in the flood-related TJC component are as follows:

- The temporary jobs created must be in public or private non-profit agencies.
- The employment shall not exceed 6 months in duration or a maximum of 1,040 hours if the participant works less than 40 hours per week.
- The maximum wage allowed per individual is \$12,000.

For additional information, please contact:

Employment Development Department ATTN: JIM CURTIS 800 Capitol Mall, MIC 69-1 Sacramento, CA 95814 (916) 654-7799

2/10/98

Date:	
То:	JIM CURTIS c/o Laine Hendra-Aldrich Employment Development Department 800 Capitol Mall, MIC 69-1 Sacramento, CA 95814 (916) 654-8275 (916) 657-0055 Fax email c/o lhendra@edd.ca.gov
From:	
Subject:	Flood Assistance 1998 Project
	Preliminary estimate of funding needs
	Preliminary estimate of the number of temporary jobs to be created
	Other information:

Please fax or email this form with the information requested by the close of business Monday, February 23, 1998. This will be considered preliminary information that is subject to update at your discretion or upon request.

STATE OF CALIFORNIA JOB TRAINING PARTNERSHIP ACT TITLE III

ADJUSTMENT SERVICES PROJECT PLAN APPLICATION / AMENDMENT REQUEST SIGNATURE PAGE

SUBGRANTEE:					
PROJECT TITLE: Flood Assistar	nce 1998 Projec	ct			
TERM:	THR	OUGH	February 2	28, 1999	
INITIAL APPLICATION ("X"):	AN	MENDMEN	T REQUEST NU	JMBER:	
SUMMARY PURPOSE STATEM	ENT:				
The purpose of this project is to measured by torrential rain storms of assist JTPA Title III eligible disloct special temporary jobs that would	ccurring in Jan ated workers u	uary 1997. nder this p	The primary se roject will be the	ervice strategy to establishment of	
THIS PROJECT APPLICATION/A DOCUMENTS MARKED WITH A Narrative Participant Project Plan Budget Summary/Support APPROVAL FOR SUBGRANTEE copies):	N "X": Documents				
				/ /	
TYPED NAME AND TITLE	SIGNA	TURE AN	ID DATE		
FOR STATE USE ONLY					
31121					
Program Manager signature and date: / /					
Fund Coordinator signature and date:				/ /	
Regional / Industrywide Project	Yes	Χ	No		
Subgrantee Code (Alpha):	JTA Code: 708	YOA:	Amount:		
		1998	\$		
		199	\$		
		199	\$		

SUBGRANTEE:	
PROJECT TITLE:	Flood Assistance 1998 Project
PROJECT TERM:	through February 28, 1999

NATURAL DISASTER EMERGENCY DISLOCATED WORKER PROJECT PLAN NARRATIVE

	TO ALLO COLOR
1.	Description of the Emergency
	a. Estimated number of workers dislocated from employment is
	b. Geographic Location of the Emergency
	c. Location of Services and Activities (if different from the location of the
	emergency)
	d. The projected immediate recovery period is
	through
2.	Identification and Recruitment of Affected Workers/Participants to be Served.
3.	Temporary Job Creation
	Attach Planned Temporary Job Creation List.

IMPLEMENTATION SCHEDULE

SUBGRANTEE:	
PROJECT TITLE:	Flood Assistance 1998 Project
PROJECT TERM:	through February 28, 1999

PROGRAM YEAR QUARTER END:	3/98	6/98	9/98	12/98	3/99	6/99
QUARTERLY ENROLLMENT AND TERMINATION BENCHMARKS						
Total Participants Enrolled						
Total Terminations						
Current Enrollment						
E	nd of Pr	oject Goa	als			
Total Receiving B	asic Read	djustment	Services			
Total Temporary Job Creation Enrollment						
Total Ent	ered Emp	oloyments	3			
Total Transferring to Other Programs						
Total O	ther Term	ninations				

PLANNED CUMULATIVE QUARTERLY EXPENDITURES OF NRA GRANT FUNDS

Subgrantee:	
Project Title:	Flood Assistance 1998 Project
Project Term	through February 28, 1999

Cost Category	3/31/98	6/30/98	9/30/98	12/31/9	3/31/99	6/30/99
Total Expenditures						
Administration						
Basic Readjustment Services						
Retraining (Inc. TJC)						
Supportive Services & Needs Related Payments (NRPs)						

Subgrantee:	
Project Title:	Flood Assistance 1997 Project
Project Term	through February 28,1999

Expense Item	Cost Category					
	Admin.	BRS	Retraining	Supp. Svs. & NRPs	Total	
Staff Salaries						
Staff Fringe Benefits						
Staff Travel						
Communications						
Facilities						
Office Supplies						
Consumable Testing & Instruction Materials						
Equipment* Use/Depreciation:						
Purchase:						
Lease:						
Participant Wages and Benefits						
(Disaster Projects Only)						
Supportive Services						

Other (specify):			
Total			

 Enter in the following space or attach a list of equipment/furniture items with a unit cost of \$5000 or more to be purchased or leased, and, for purchased items, a justification for purchase Vs lease or use charges. Also, list equipment/furniture items where the total cost of all such items being charged to the grant is more than \$20,000, and provide an explanation of the need for the items.

Subgrantee:	
Project Title:	Flood Assistance 1997 Project
Project Term	through February 28,1999

NATURAL DISASTER EMERGENCY PLANNED TEMPORARY JOB CREATION LIST

MAJOR JOB CATEGORY/TITLE	EMPLOYING AGENCY NAME	WORKSITE AGENCY	NUMBER OF SLOTS	WAGE OR WAGE RANGE

1997 FLOOD ASSISTANCE MEETING JANUARY 9, 1997

A. INFORMATION DISCUSSION

1. CURRENT STATUS

- Forty-two counties, encompassing 26 Service Delivery Areas (SDA), have received Gubernatorial declaration of disaster areas.
- On January 3 Governor Wilson sent letters to President Clinton and the Secretary of Labor requesting \$25 million from the Title III National Reserve Account.
- On January 6 the Governor's Office issued a press release announcing the request for funds.
- California anticipates a quick response to the request, therefore SDAs need to gear up and be ready to start work as soon as the funds are received.
- In addition to the SDAs and EDD field offices, three agencies, La Cooperativa, California Conservation Corp. (CCC) and Northern Indian Development Council (NIDC), will be assisting in this project.

2. PROJECT COMMUNICATION

- Laine Hendra-Aldrich and Luis Hermosillo will be the JTPD staff responsible for the development and implementation of the 97 Flood Project. They will be the principal contact for questions and technical assistance. They can be reached at the following numbers:
 - Laine (916) 654-5595
 - Luis (916) 654-5416
- Once the project has been implemented, the SDAs assigned Program Manager will be the principal contact for information and assistance.
- JTPD will be using "Flood Assistance Alert" notices, in lieu of Information Bulletins or Directives, to send written communication to SDAs. The first Alert was dated January 7, 1997.

3. PROJECT PLANNING AND IMPLEMENTATION

- Once JTPD receives approval from DOL, we will calculate a reasonable distribution of the funds based on the SDAs' preliminary estimate of need. A minimum threshold of \$85,000 per SDA has been established.
- Funds will be unilaterally modified into the SDAs' master subgrant within two days from receipt of the funds.
- SDAs need to establish communications with the various agencies within their counties in order to begin development of worksites as quickly as possible.
- After receipt of DOL approval, JTPD can provide letters of intent to SDAs in order to expedite the local process for gearing up.
- The main focus of the Flood Assistance Project is to assist with clean up and restoration to enable resumption of regular employment. This assistance is provided by establishing temporary jobs that will benefit the public through clean-up activities.

- In developing worksites, SDAs must consider the appropriateness of the worksite. The work must be associated with the disaster or evolved as a result of the disaster.
- SDAs should establish worksite agreements with each participating agency. (Similar to SYETP).

4. TEMPORARY JOBS - RULES AND LIMITATIONS

- An individual working in a temporary job is limited to 6 months duration or \$12,000 in wages, whichever occurs first.
- SDAs should pay only the required minimum amounts for fringe benefits, such as taxes and workers compensation.
- The payment of Unemployment Insurance (UI) is not mandatory, it is a local choice. If UI is paid, the participant must have additional quarters of non-temporary wages in order to receive UI benefits.
- Individuals working in the temporary jobs must meet the Title III eligibility for long term unemployed or have become unemployed because of the disaster event.
- Wages and benefits of the temporary jobs will be charged to Retraining.
- Costs associated with Basic Readjustment Services should be kept to a minimum.
- Admin. costs should be kept to a minimum with a maximum cap of 13.5 percent.
- SDAs need to establish systems to track the time and wage limitations.

5. MONITORING AND REPORTING

- SDAs will be expected to start participants in temporary jobs within 30 days after receipt of the funds.
- JTPD will monitor project implementation closely and if participants are not working within 30 days, funds will be returned to the state for redistribution.
- Monthly and quarterly reports will be required. These will be used to monitor progress.
- SDAs should also consider "friendly deobligation" of funds in the event that need has diminished.

6. PROJECT PLAN

- A project plan application was distributed at the meeting.
- The plan must be completed and returned to Laine Hendra-Aldrich or Luis Hermosillo at JTPD within 30 days after the receipt of funding.
- Any questions regarding the project plan application should be addressed to Laine or Luis.

B. QUESTIONS AND ANSWERS

- 1. Q. Has the list of the 41 affected counties been distributed? Some counties were not included in the initial declaration.
 - A. JTPD will make the most recent list available. Unfortunately the list has been changing as new counties are added. JTPD is in close contact with Office of Emergency Services for the must current information.

- 2. Q. How much was requested and what fund source?
 - A. \$25 million has been requested from the Job Training Partnership Act Title III National Reserve Account.
- 3. Q. If more counties are affected by the disaster, will the state request an increase in the funds?
 - A. Yes. As we continue to assess the situation and we establish an additional need, the state will forward this need to DOL.
- 4. Q. What is the effective date to begin operations?
 - A. The effective date will be the date the Grant Officer signs the Notice of Obligation. JTPD will notify SDAs immediately of this date.
- 5. Q. Will there be a push to request more funds if they (DOL) gives us less than we requested?
 - A. If we have established a need, the state will try.
- 6. Q. Is it possible to obtain waivers in the Title III 60 percent program to operate this project?
 - A. No. Only the funds set aside in the Secretary's National Reserve Account can be used for disaster projects.
- 7. Q. If work is to be done on federal lands will the State establish the contact?
 - A. The local SDA should make the contact with the federal agency involved.
- 8. Q. We have over 400 residences in our county affected by the disaster? What can we do to assist on private lands?
 - A. Work on private property may only occur where it is needed to restore the operation of public services or where there is a clear safety hazard to the larger community. If county employees are working on private land, participants working as temporary county employees may also assist.
- 9. Q. Can participants work on private levees?
 - A. If regular county employees are conducting the same work.
- 10. Q. Will the \$25 million be distributed to SDAs alone?
 - A. No. La Cooperativa, CCC., NIDC and EDD field offices will also receive disaster funds.
- 11. Q. Will EDD do the Title III eligibility?

- A. Yes, for the three non-SDA agencies.
- 12. Q. Some issues surfaced during the 95 Flood Project with non-SDA service providers. Prevailing wages provided to the participants were different between the SDA and the non-SDA service provider and there were also differences in employment terms. Need to stress the importance of coordination at the beginning of the project.
 - A. The three agencies, La Cooperativa, CCC and NIDC, are aware of the need to coordinate efforts and the state will advocate this coordination as much as possible.
- 13. Q. With the 95 Flood Project, we experienced an increase in our worker compensation claims that affected our experience rate for the entire program? How can we avoid this?
 - A. Suggestion was made to purchase a separate workers compensation policy.
- 14. Q. What is the participant eligibility and what documentation do we use?
 - A. The Title III participant eligibility for long term unemployed will apply to this project. Additionally any individuals who have become unemployed because of the disaster will meet the eligibility requirements. SDAs should use the standard Title III eligibility documentation.
- 15. Q. Will there be transition services for the participants enrolled in the Flood Project?
 - A. Yes. Where appropriate, Flood participants should be transitioned to other services. SDAs should use their local Title III funds for the transition services. We anticipate that Title III 40 percent funds will be set aside to assist with this effort.
- 16. Q. If an individual is enrolled in Title III presently, can we transfer them to this project?
 - A. Based on past experience, we believe that the Title III eligibility for this project will be limited to the two criteria described in question 14. (Long term unemployed and unemployed as a result of the disaster) Once we receive DOL approval this may be further clarified.
- 17. Q. What equipment can be purchased? Can we purchase chain saws?
 - A. Small items such as shovels, rakes etc. can be purchased. Larger items should be leased. The state will research and issue instructions for the purchase of chain saws.
- 18. Q. Can SDAs use admin cost pools to charge administrative costs to this project?

- A. The regulations state that grant recipients should not automatically budget 15 percent admin., in this case 13.5 percent at the SDA level All costs must be reflected as either direct charges to specific budget line items or an indirect rate. If an indirect cost is used, a copy of the most recent approval document from the cognizant federal agency shall be included in the grant application. The state will research this question and provide additional information to SDAs.
- 19. Q. What percent of staff time can be charged to basic readjustment services?
 - A. We cannot provide an exact percentage, but SDAs should charge minimal staff time to basic readjustment services. The main focus should be participant wages.
- 20 Q. Can an SDA subcontract services?
 - A. Yes, as long as you use local JTPA procurement procedures.
- 21. Q. What is the time limit for the project duration?
 - A. This will be answered when we receive the Grant Officer's approval letter. Normally project duration runs between 12 and 18 months.
- 22. Q. Sometimes the repair work cannot be started until after snow has been removed or flood waters have subsided. How will this affect our project if we cannot start within the 30 day period?
 - A. SDAs should make every attempt to begin project work immediately. If there is a delay due to snow removal, etc. notify the JTPD Flood staff (Laine or Luis) immediately.
- 23. Q. Can we use sole source contracting?
 - A. Yes, because of the emergency nature of this project. However, SDAs need to follow their local procurement policies.
- 24. Q. The entities we contracted with on the 95 Flood project, required us to pay PERS if the participant worked over 1,000 hours. Is there a way to avoid these costs?
 - A. It was suggested that the SDA become the employer and not the county. Or terminate the participant before they reach the 1,000 hours.